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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WARREN HUCH,

Plaintiff,

vs.

PACIFIC SEAFOOD – LAS VEGAS, LLC,
et al.,

Defendants.

CASE NO.: 2:24-cv-01445-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

(First Request)

Pursuant to Local Rule IA 6.1 and 26-3, the Parties to this action, acting by and through their respective counsel of record, hereby stipulate and request the Court to order that all discovery deadlines be extended by 90 days. This is the first request for an extension of these deadlines. In support of this Stipulation and Order, the parties state as follows:

1. Plaintiff commenced this action on August 7, 2024, and service on the Defendants took place thereafter.
2. Defendants filed their answer on September 23, 2024.
3. After the answer was filed, Plaintiff and Defendants engaged in the planning conference mandated by Federal Rule of Civil Procedure 26(f) and submitted a discovery plan and scheduling order. The Court entered a scheduling order on October 21, 2024.
4. The Parties have exchanged their initial disclosures, as well as supplements.
5. On December 12, 2024, a Stipulation to Substitute Counsel for Defendants was filed.

1 6. The Parties participated in an Early Neutral Evaluation on December 16,
2 2024, which did not result in a resolution of this case.

3 7. An extension of the discovery cut-off date, and all other related deadlines, is
4 necessary due to the substitution of Defendants' counsel, and to allow the Parties to identify
5 and retain any potential expert witnesses and otherwise conduct discovery in this case.

6 8. This request is being made more than 21 days before the initial expert witness
7 disclosure deadline of January 20, 2025.

8 9. This request for an extension of time is not sought for any improper purpose
9 or other purpose of delay. Rather, it is sought by the parties to allow sufficient time for the
10 disclosure of potential expert witness(es) in this matter and to otherwise conduct proper
11 discovery.

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WHEREFORE, the parties respectfully request that the Court extend the deadline for initial expert witness disclosures by 90 days to April 18, 2025. As that extension will impact other discovery deadlines, the parties respectfully request that the Court also extend the following deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Initial Expert Witness Disclosure	January 20, 2025	April 18, 2025
Rebuttal Expert Witness Disclosure	February 19, 2025	May 19, 2025 (to account for the weekend)
Discovery Deadline	March 19, 2025	June 17, 2025
Dispositive Motion Deadline	April 18, 2025	July 17, 2025
Joint Pre-Trial Order Deadline	May 16, 2025	August 15, 2025 (or 30 days after decision on the dispositive motions)

DATED this 17th day of December, 2024.

CHRISTENSEN JAMES & MARTIN, CHTD.

HARTWELL THALACKER, LTD.

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 12-19-24